

Joint Exhibit 2

OPPOSED PROTECTIVE ORDER PROVISIONS

	Google's Proposals	Plaintiffs' Proposal
¶14	A copy of each executed Agreement Concerning Confidentiality must be provided to Outside Counsel of Record for the producing Party within (3) three days of its execution and prior to disclosing any Confidential Information or Highly Confidential Information.	None.
App. A ¶4	I represent that I am/am not an employee, consultant, or representative of, volunteer for, or otherwise affiliated with or independent-contractor to, (a) any competitor of any Google product or service substantially related to the subject matter of the Investigation or this Action, (b) a complainant in any other substantially-related regulatory investigation of or litigation against Google, or (c) any person or entity that is (or was during the pendency of the Investigation or this Action) adverse to Google in any other judicial or administrative proceeding substantially related to the subject matter of the Investigation or this Action.	None.
¶30	None.	Notwithstanding any Google policy, agreement, or term to the contrary, neither Google nor anyone acting on Google's behalf will communicate to any In-House Counsel or Outside Counsel of Record or anyone else working on behalf of Google related to this litigation any information that is collected through or derived from any Google application or service, where such information is (1) communicated for any purpose relating to this Action and (2) associated with any individual Google knows or suspects is an employee, agent, or representative of one or more of the Plaintiff States.